

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

PRIORITIES USA,  
RISE, INC., and  
DETROIT/DOWNRIVER CHAPTER  
OF THE A. PHILIP RANDOLPH  
INSTITUTE,

Plaintiffs,

v.

DANA NESSEL,

Defendant,

and

MICHIGAN  
HOUSE OF REPRESENTATIVES,  
MICHIGAN SENATE,  
MICHIGAN  
REPUBLICAN PARTY, and  
REPUBLICAN  
NATIONAL COMMITTEE,

Intervenor–Defendants.

Civil No. 19-13341

DAWKINS DAVIS, J.  
ALTMAN, M.J.

**INITIAL WITNESS LIST BY  
THE REPUBLICAN COMMITTEES**

Intervenor-Defendants Republican National Committee and Michigan Republican Party (the “**Republican Committees**”) serve this initial witness list as directed in the Case Management Order, ECF 110, PageID.1870.

1. All past and present officers, directors, members, employees, representatives, volunteers, independent contractors, and/or agents (collectively, “**Agents**”) of Priorities USA and any local chapter with knowledge of facts

relevant to this litigation.

2. All Agents of Rise, Inc. with knowledge of facts relevant to this litigation.

3. All Agents of the Detroit/Downriver Chapter of the A. Phillip Randolph Institute with knowledge of facts relevant to this litigation.

4. Employees of the Michigan Department of Attorney General who have worked or are currently working in the Criminal Justice Bureau and/or the Criminal Investigations Division on the investigation or prosecution of violations of election laws.

5. Current and former employees of the Michigan Department of State who have worked or are currently working in the Bureau of Elections.

6. Current and former county clerks, city clerks, and township clerks in Michigan.

7. Anyone named in a pleading, responsive pleading, motion paper, deposition testimony, or discovery demand or response of any kind.

8. Anyone who may be identified during discovery.

9. Anyone who should have been disclosed by any other party in this case in response to a discovery request or deposition questioning.

10. Anyone listed on any party or intervenor's witness lists.

11. Custodians of records who may become known prior to trial.

12. Any expert witnesses disclosed by any party.

13. Any necessary rebuttal witnesses.

14. Any necessary impeachment witnesses.

The Republican Committees reserve the right to amend their witness list until trial.

Respectfully submitted,

BUTZEL LONG, P.C.

**JOSEPH E. RICHOTTE P70902**

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Dated: OCTOBER 4, 2021

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